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**Via ECF, Email and Hand Delivery**

The Honorable Martin Glenn  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green, Courtroom 523  
New York, New York 10004

Re: *Motors Liquidation Company Avoidance Action Trust v. JPMorgan  
Chase Bank, N.A.*, Case No. 09-00504 (MG)

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Dear Judge Glenn:

We represent plaintiff Motors Liquidation Company Avoidance Action Trust. Plaintiff's reply in further support of its Motion for Partial Summary Judgment Dismissing the Non-JPMorgan Term Lenders' Effectiveness Defense is due to be filed this Friday, October 26, 2018. We write respectfully to request the Court's permission to file a 15-page reply brief. Among other reasons, the additional five pages are necessary to address two expert declarations submitted by the Non-JPMorgan Term Lenders in connection with their opposition to plaintiff's motion. We have conferred with Munger Tolles & Olson LLP, counsel for certain Non-JPMorgan Term Loan Lenders, and they do not object to this request.

We thank the Court for its attention to this request to exceed the reply brief page limit by five pages.

Respectfully,

/s/Eric B. Fisher  
Eric B. Fisher

cc: All counsel of record (by ECF)